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9 Attorneys for **TIMBERWORK, INC.**
10 (erroneously sued as "TIMBERWORK OREGON, INC."),
11 JOAN L. SHUELL and EARL BLONDHEIM

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

20 MATSUNOKI GROUP, INC. dba HAIKU HOUSES,) CASE NO. CV 08 4078 CW
21 Plaintiff,)
22 v.) **JOINT STIPULATION TO CONTINUE
23 JURISDICTIONAL
DISCOVERY/MOTIONS DEADLINES;
24 ORDER**
25 TIMBERWORK OREGON, INC.;)
26 TIMBERWORK, INC.; JOAN L. SHUELL;) Hon. Claudia Wilken
27 EARL MAURY BLONDHEIM; DON)
28 PAUL; ILENE ENGLISH-PAUL; and) Action Filed: 8/25/08
DOES 1 through 10, inclusive,)
Defendants.)
Plaintiff MATSUNOKI GROUP, INC. dba HAIKU HOUSES and Defendants
TIMBERWORK, INC. (formerly known as and erroneously sued as "TIMBERWORK
OREGON, INC."), JOAN L. SHUELL and EARL MAURY BLONDHEIM, hereby jointly
stipulate to continue the jurisdictional discovery/motions deadlines by 14 days.
On October 10, 2008, Defendants Shuell and Blondheim filed a motion to dismiss
for lack of personal jurisdiction and for improper venue. On December 4, 2008, this Court
granted Shuell's and Blondheim's motions to dismiss with leave to amend. Pursuant to this
Court's minute order dated December 4, 2008, the parties were to complete jurisdictional
discovery within 60 days, by February 2, 2009.

1 This Court's order deferring ruling on Shuell's and Blondheim's motion to dismiss
2 dated December 12, 2008, provided that Plaintiff Matsunoki may submit a five-page
3 supplemental brief in support of its opposition to Shuell's and Blondheim's motion to
4 dismiss for lack of personal jurisdiction within 60 days, by February 10, 2009. The
5 December 12, 2008 order also provided that Shuell and Blondheim would have two weeks
6 to respond in a five-page reply to Matsunoki's supplemental brief, by February 24, 2009.

7 On January 9, 2009, Timberwork, Inc., Shuell and Blondheim substituted the law
8 firm of Lewis Brisbois Bisgaard & Smith LLP as their attorney of record in the place and
9 stead of the law firm of Donahue Gallagher Woods LLP. By that date, Blondheim's and
10 Shuell's depositions regarding jurisdiction had been scheduled for January 22, 2009 and
11 January 23, 2009, respectively, and Shuell's and Blondheim's responses to Matsunoki's
12 interrogatories regarding personal jurisdiction and requests for documents regarding
13 personal jurisdiction, served on December 16, 2008, were due by January 20, 2009.

14 Due to the severe time constraints imposed by the current schedule, and for
15 purposes of allowing new counsel for Shuell and Blondheim adequate time to review
16 voluminous documents, provide substantive responses to the interrogatories and requests
17 for documents and properly prepare for Shuell's and Blondheim's depositions, on January
18 15, 2009, counsel for Shuell and Blondheim requested that Matsunoki's counsel agree to
19 stipulate to extend the jurisdictional discovery deadlines and deadlines regarding the
20 supplemental and reply briefs by two weeks. Matsunoki's counsel agreed to so stipulate.
21 Therefore, the parties agree and stipulate to the following, subject to the Court's approval:

22 1. The jurisdictional discovery deadline as set forth in this Court's order dated
23 December 4, 2008 is moved from February 2, 2009 to February 16, 2009.

24 2. The deadline for Matsunoki to submit a five-page supplemental brief in
25 support of its opposition to Shuell's and Blondheim's motion to dismiss for
26 lack of personal jurisdiction as set forth in this Court's order dated December
27 12, 2008, is moved from February 10, 2009 to February 24, 2009.

28 3. The deadline for Shuell and Blondheim to respond in a five-page reply to

1 Matsunoki's supplemental brief as set forth in this Court's order dated
2 December 12, 2008, is moved from February 24, 2009 to March 10, 2009.
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4 Respectfully submitted,

5 DATED: January ___, 2009 LEWIS BRISBOIS BISGAARD & SMITH LLP
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7
8 By _____
9 Julian J. Pardini
Alan J. Haus
Rowena C. Seto
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11 DATED: January ___, 2009 GORDON & REESE LLP
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13
14 By _____
Richard P. Sybert
Craig J. Mariam
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17 **ORDER**

18 Upon reviewing the above-stipulated request of the parties for an order continuing
19 the jurisdictional discovery deadlines,

20 **IT IS HEREBY ORDERED** that:

21 1. The jurisdictional discovery deadline as set forth in this Court's order dated
22 December 4, 2008 is moved from February 2, 2009 to February 16, 2009.
23 2. The deadline for Matsunoki to submit a five-page supplemental brief in
24 support of its opposition to Shuell's and Blondheim's motion to dismiss for
25 lack of personal jurisdiction as set forth in this Court's order dated December
26 12, 2008, is moved from February 10, 2009 to February 24, 2009.

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1 3. The deadline for Shuell and Blondheim to respond in a five-page reply to
2 Matsunoki's supplemental brief as set forth in this Court's order dated
3 December 12, 2008, is moved from February 24, 2009 to March 10, 2009.
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5 DATED: January 22, 2009

6 By

Claudia Wilken

7 HONORABLE CLAUDIA WILKEN
8 UNITED STATES DISTRICT JUDGE

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